

# Exhibit C

to Movant's Motion to Quash

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**CASE NO:** \_\_\_\_\_

IN RE: MOTION TO QUASH  
SUBPOENA FOR DEPOSITION  
SERVED ON DAVID FRIEND

\_\_\_\_\_/

**DECLARATION OF BLAIR ROBINSON, ESQ.**

BLAIR ROBINSON, ESQ., being duly sworn deposes and states:

1. My name is Blair Robinson. I am an attorney admitted to practice before the United States District Court for the Southern District of New York. I am counsel in the above-captioned matter for CBS Television Stations Inc., CBS Broadcasting, Inc., and CBS Corporation (collectively, “Movant” or “CBS”). I have personal knowledge regarding the matters set forth herein, and submit this declaration in support of the Motion to Quash or, in the Alternative, Motion for Protective Order (“Motion”) filed by Movant in the above-captioned matter.

2. The Motion concerns a non-party subpoena initially dated August 10, 2021 (the “Subpoena”) directed to David Friend (“Mr. Friend”). The Subpoena was issued by Silva Harapeti (“Harapeti”) in the case styled *Silva Harapeti v. CBS Television Stations, Inc., et al.*, No. 20-cv-22995, currently pending before the

United States District Court for the Southern District of Florida (the “Florida Action”).

3. I am also counsel for Movant in the Florida Action.

4. On June 15, 2021, Harapeti served a Notice of Deposition for the deposition of Mr. Friend in a separate, but related action also filed by Harapeti against Movant in the U.S. District Court for the Southern District of Florida alleging overtime violations under the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* (“FLSA”) (the “FLSA Action”). I am also counsel for Movant in the FLSA Action. This Notice of Deposition scheduled Mr. Friend’s deposition for August 10, 2021.

5. On July 20, 2021, Harapeti’s counsel was advised that Mr. Friend was no longer employed by Movant and that his attendance at deposition could not be compelled via notice, but that Mr. Friend would need to be subpoenaed. A true and correct copy of the July 20, 2021 email is attached as **Exhibit 1**.

6. On August 10, 2021, at approximately 9:05 AM, Harapeti’s counsel, sent notice that a subpoena had been issued and purportedly served in the FLSA Action (the “First Subpoena”) and that this subpoena scheduled Mr. Friend’s deposition for the same day, only an hour after counsel’s email containing notice was sent. A true and correct copy of the August 10, 2021 email correspondence from Harapeti’s counsel, with attachments, is attached as **Exhibit 2**. Although the Certificate of Service annexed to the First Subpoena certifies that the First Subpoena


was emailed to me (and my team members) on July 27, 2021, this is untrue. At no point prior to the August 10th email did Harapeti's counsel notify either me or any member of my team that the First Subpoena had been issued or that Mr. Friend's deposition was scheduled for August 10, 2021.

7. Accordingly, my associate immediately advised Harapeti's counsel that the Local Rules of the issuing Court, the U.S. District Court for the Southern District of Florida, required that "a party desiring to take the deposition in another State of any person upon oral examination shall give at least fourteen (14) days' notice in writing to every other party to the action and the deponent (if the deposition is not of a party)." *See* S.D. Fla. L.R. 26.1(h). A true and correct copy of the August 10, 2021 email from Movant's counsel is attached as **Exhibit 3**.

8. Later that same day on August 10, 2021, Harapeti issued another subpoena for Mr. Friend's deposition in the Florida Action—the Subpoena—which schedules Mr. Friend's deposition for August 27, 2021. A true and correct copy of the August 10, 2021 service email from Harapeti's counsel is attached as **Exhibit 4**.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 18, 2021.

By:   
BLAIR J. ROBINSON, ESQ.

# Exhibit 1

to the Declaration of Blair Robinson, Esq.

---

**From:** Davis, Benjamin Cody  
**Sent:** Tuesday, July 20, 2021 12:14 PM  
**To:** Peter M. Hoogerwoerd  
**Cc:** Robinson, Blair; Evans, Paul  
**Subject:** Harapeti v. CBS - Dunn and Friend Depositions

Peter,

We write regarding the Notices directed to Peter Dunn and David Friend.

We have recently been informed that CBS no longer has control over these individuals such that their attendance at a deposition can be compelled via Notice to CBS. Rather, they must be compelled to appear via subpoena.

Please let us know if you would like to discuss.

Thanks,  
Ben

**Benjamin C. Davis**  
Associate Attorney  
Baker & McKenzie LLP  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131 USA  
Tel: +1 305 789 8922  
Fax: +1 305 789 8953  
benjamin.davis@bakermckenzie.com

**Baker  
McKenzie.**

# Exhibit 2

to the Declaration of Blair Robinson, Esq.

---

**From:** Peter M. Hoogerwoerd <pmh@rgpattorneys.com>  
**Sent:** Tuesday, August 10, 2021 9:05 AM  
**To:** Robinson, Blair  
**Cc:** Davis, Benjamin Cody; Evans, Paul; Roppolo, William V.  
**Subject:** [EXTERNAL] FW: ROD Job Done - Served for (FRIEND, DAVID)

Blair,

Please see return of service for David Friend, below.

Very truly yours,

---

**PETER M. HOOGERWOERD, ESQ.**  
*Equity Partner*

Main: 305-416-5000  
Direct: 786-457-1062  
Fax: 305-675-0665  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
[Attorney Biography](#)

**REMER & GEORGES-PIERRE PLLC**  
ATTORNEYS AT LAW

COURTHOUSE TOWER  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

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---

**From:** WSP Server <[DBSServer@dbinfo.net](mailto:DBSServer@dbinfo.net)> **On Behalf Of** Due Process, LLC  
**Sent:** Monday, August 9, 2021 3:52 PM  
**To:** [PMHASSISTANT@RGPATTORNEYS.COM](mailto:PMHASSISTANT@RGPATTORNEYS.COM); [pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com); [dbujan@rgpattorneys.com](mailto:dbujan@rgpattorneys.com); [ns@rgpattorneys.com](mailto:ns@rgpattorneys.com)  
**Cc:** Due Process, LLC <[service@dueprocessglobal.com](mailto:service@dueprocessglobal.com)>  
**Subject:** ROD Job Done - Served for (FRIEND, DAVID)

To: REMER & GEORGES-PIERRE PLLC

This is an automated message relating to:



**Our Job Number:** 2021000390

**Your Reference Number:**

**Party To Be Served:** FRIEND, DAVID

**Documents To Be Served:** Subpoena for Deposition and Notice of TAKING DEPOSITION

**Case Info:** Florida SOUTHERN 20-CV-20961

**Court Date/Time:** : Aug 10 2021 10:00AM

**Case Style:** SILVA HARAPETI, and other similarly situated individuals vs. CBS TELEVISION STATIONS INC., and CBS BROADCASTING, INC.,

**Service Information**

Recipient was SERVED on Aug 7 2021 3:12PM

**Type of Service:** AUTHORIZED

**Original Service Address:** DAVID FRIEND, [REDACTED] W 89TH STREET, [REDACTED] NEW YORK, NY 10024

**Service Details:** served an AUTHORIZED entity by delivering a true copy of the Subpoena for Deposition and Notice of TAKING DEPOSITION with the date and hour of service endorsed thereon by me, to: BARON H as DORRMAN at the address of: [REDACTED] W 89TH STREET, [REDACTED] NEW YORK, NY 10024, who stated they are authorized to accept service for DAVID FRIEND, and informed said person of the contents therein, in compliance with state statutes.

**Attachments:**

[Link to Invoice](#) [Link to Affidavit](#)

Thank you,

Due Process, LLC

[service@dueprocessglobal.com](mailto:service@dueprocessglobal.com)

Phone: (305) 490-4346

More detailed status is available at [www.PstProStatus.net](http://www.PstProStatus.net)

---

**From:** Peter M. Hoogerwoerd <pmh@rgpattorneys.com>  
**Sent:** Tuesday, August 10, 2021 9:09 AM  
**To:** Robinson, Blair; Davis, Benjamin Cody; Roppolo, William V.; Evans, Paul  
**Subject:** [EXTERNAL] FW: Harapeti, Silva v CBS Television Stations Inc. et al. / Witness: David Friend  
**Attachments:** SUBPOENA FOR DEPOSITION - David Friend.pdf; Notice of depo - David Friend.pdf

Please see attached subpoena and notice of deposition for David Friend today at 10:00 a.m.

Very truly yours,

---

**PETER M. HOOGERWOERD, ESQ.**  
*Equity Partner*

Main: 305-416-5000  
Direct: 786-457-1062  
Fax: 305-675-0665  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
[Attorney Biography](#)

**REMER & GEORGES-PIERRE PLLC**  
ATTORNEYS AT LAW

COURTHOUSE TOWER  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

---

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---

**From:** PMH Assistant <[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)>  
**Sent:** Tuesday, August 10, 2021 9:08 AM  
**To:** Peter M. Hoogerwoerd <[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)>  
**Subject:** FW: Harapeti, Silva v CBS Television Stations Inc. et al. / Witness: David Friend

Kindest Regards,

---

**Niurizette Reyes**  
*Legal Assistant*  
*(Not an attorney)*

Main: 305-416-5000  
Fax: 305-416-5005  
[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)

**REMER & GEORGES-PIERRE PLLC**  
ATTORNEYS AT LAW

Courthouse Tower  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

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---

**From:** PMH Assistant [mailto:[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)]

**Sent:** Tuesday, July 27, 2021 4:21 PM

**To:** 'Due Process, LLC' <[service@dueprocessglobal.com](mailto:service@dueprocessglobal.com)>

**Cc:** Peter M. Hoogerwoerd <[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)>; 'Chabely Lopez' <[clopez@rgpattorneys.com](mailto:clopez@rgpattorneys.com)>; Cristobal Bobadilla-Gamboa <[cbg@rgpattorneys.com](mailto:cbg@rgpattorneys.com)>

**Subject:** Harapeti, Silva v CBS Television Stations Inc. et al. / Witness: David Friend

Hello Juan,

See attached Notice of Deposition and Subpoena for Mr. David Friend. Please serve this at the address below and note the Deposition is scheduled for August 10<sup>th</sup>.

**David Friend**

[REDACTED]

Kindest Regards,

---

**Niurizette Reyes**  
*Legal Assistant*  
(Not an attorney)

Main: 305-416-5000  
Fax: 305-416-5005  
[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)

REMER & GEORGES-PIERRE PLLC  
ATTORNEYS AT LAW

Courthouse Tower  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

State & Federal Court Trial Attorneys

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO.: 1:20-CV-20961-KMW

SILVA HARAPETI,  
and other similarly situated individuals,

Plaintiff,  
vs.

CBS TELEVISION STATIONS INC.,  
and CBS BROADCASTING, INC.,

Defendant.

---

**SUBPOENA FOR DEPOSITION**

**TO: David Friend**

[REDACTED]  
[REDACTED]

**William V. Roppolo, Esq.**  
william.roppolo@bakermckenzie.com  
**Benjamin C. Davis, Esq.**  
benjamin.davis@bakermckenzie.com  
**BAKER & MCKENZIE LLP**  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

**Blair J. Robinson (Pro Hac Vice)**  
blair.robinson@bakermckenzie.com  
**Paul C. Evans (Pro Hac Vice)**  
paul.evans@bakermckenzie.com  
**BAKER & MCKENZIE LLP**  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

**YOU ARE COMMANDED** to appear in the United States District Court at the place, date, and time specified below to testify in the above case.

***PLACE:***

Via Zoom Videoconference

<https://proceedings.veritext.com/?token=38ea4bdb586a6b33ae44d776350e75da>

***DATE AND TIME:***

**Tuesday, August 10th, 2021 at 10:00 a.m.**

You have the right to object to the production pursuant to this subpoena at any time before production by giving written notice to the attorney whose name appears on this subpoena.

If you fail to: (1) appear as specified; or (ii) object to this subpoena, you may be in contempt of Court. You are subpoenaed by the attorney whose name appears on this subpoena and unless excused from this subpoena by the attorneys or the Court, you shall respond to this subpoena as directed.

***ISSUING OFFICER SIGNATURE AND TITLE***

/s/ Peter M. Hoogerwoerd

Peter M. Hoogerwoerd

July 27, 2021

***ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER***

Peter M. Hoogerwoerd, Esq.

Fla. Bar No.: 0188239

[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)

***Remer & Georges-Pierre, PLLC***

44 West Flagler Street, Suite 2200

Miami, FL 33130

(305) 416-5000- Telephone

(305) 416-5005- Facsimile

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via Electronic Mail to all parties and/or their counsel on the attached Service List in compliance with Florida Rule of Judicial Administration 2.516 this 27<sup>th</sup> day of July of 2021.

**William V. Roppolo, Esq.**  
william.roppolo@bakermckenzie.com  
**Benjamin C. Davis, Esq.**  
benjamin.davis@bakermckenzie.com  
**BAKER & MCKENZIE LLP**  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

**Blair J. Robinson (Pro Hac Vice)**  
blair.robinson@bakermckenzie.com  
**Paul C. Evans (Pro Hac Vice)**  
paul.evans@bakermckenzie.com  
**BAKER & MCKENZIE LLP**  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

**David Friend**  
[REDACTED]  
[REDACTED]

/s/ Peter M. Hoogerwoerd  
Peter M. Hoogerwoerd, Esq.  
Fla. Bar No.: 0188239  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
**Remer & Georges-Pierre, PLLC**  
44 West Flagler Street, Suite 2200  
Miami, FL 33130  
(305) 416-5000- Telephone  
(305) 416-5005- Facsimile

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**CASE NO.: 1:20-CV-20961-KMW**

SILVA HARAPETI,  
and other similarly situated individuals,  
Plaintiff,  
vs.

CBS TELEVISION STATIONS INC.,  
and CBS BROADCASTING, INC.,  
Defendant.

---

**NOTICE OF TAKING DEPOSITION**

TO: William V. Roppolo, Esq.  
william.roppolo@bakermckenzie.com  
Benjamin C. Davis, Esq.  
benjamin.davis@bakermckenzie.com  
BAKER & MCKENZIE LLP  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

Blair J. Robinson (Pro Hac Vice)  
blair.robinson@bakermckenzie.com  
Paul C. Evans (Pro Hac Vice)  
paul.evans@bakermckenzie.com  
BAKER & MCKENZIE LLP  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

PLEASE TAKE NOTICE that at the following location, on **Tuesday, August 10<sup>th</sup>, 2021**  
**at 10:00 a.m.** the undersigned attorney for Plaintiff in the above-styled cause will, for the purpose  
of discovery, by oral examination take the following depositions:



**Time/Deponent:** 10:00A.M. – David Friend

**Location:** Via Zoom Videoconference  
<https://proceedings.veritext.com/?token=38ea4bdb586a6b33ae44d776350e75da>

The deposition may continue from day to day until completed. The deposition will be taken before an officer authorized to record the testimony. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, before VERITEXT, Notary Public, or before some other officer authorized by law to administer oaths, who is not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, or financially interested in the action, and pursuant to adjournments, if any, by said officer until said testimony shall be completed. You are hereby notified to be present at the time and place stated, if you so desire.

Dated June 15, 2021

Respectfully submitted,

/s/ Peter M. Hoogerwoerd  
Peter M. Hoogerwoerd, Esq  
Fla. Bar No.: 0188239  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
***Remer & Georges-Pierre, PLLC***  
44 West Flagler Street, Suite 2200  
Miami, FL 33130  
(305) 416-5000- Telephone  
(305) 416-5005- Facsimile

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via Electronic

Mail to all parties and/or their counsel on the attached Service List in compliance with Florida

Rule of Judicial Administration 2.516 this 15<sup>th</sup> Day of June of 2021.

William V. Roppolo, Esq.  
william.roppolo@bakermckenzie.com  
Benjamin C. Davis, Esq.  
benjamin.davis@bakermckenzie.com  
BAKER & MCKENZIE LLP  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

Blair J. Robinson (Pro Hac Vice)  
blair.robinson@bakermckenzie.com  
Paul C. Evans (Pro Hac Vice)  
paul.evans@bakermckenzie.com  
BAKER & MCKENZIE LLP  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

/s/ Peter M. Hoogerwoerd  
Peter M. Hoogerwoerd, Esq.  
Fla. Bar No.: 0188239  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
***Remer & Georges-Pierre, PLLC***  
44 West Flagler Street, Suite 2200  
Miami, FL 33130  
(305) 416-5000- Telephone  
(305) 416-5005- Facsimile

# Exhibit 3

to the Declaration of Blair Robinson, Esq.

---

**From:** Davis, Benjamin Cody  
**Sent:** Tuesday, August 10, 2021 9:39 AM  
**To:** Peter M. Hoogerwoerd; Robinson, Blair; Evans, Paul  
**Cc:** Dines, Christina  
**Subject:** RE: [EXTERNAL] FW: Harapeti, Silva v CBS Television Stations Inc. et al. / Witness: David Friend

Peter,

We are now in receipt of the subpoenas for the depositions of David Friend and Peter Dunn.

Both subpoenas contain certificates of service in which you certify that they were served on us via email on July 27th. That is false—we received them from you for the first time only moments ago. Nobody at Baker McKenzie received notice of the subpoenas prior to this morning. Essentially, you have given us only 45 minutes notice of the deposition of Mr. Dunn, and a single day's notice of the deposition of Mr. Friend. Let this email serve as notice of your noncompliance with the Local Rules, specifically, Local Rule 26.1(h):

Reasonable Notice of Taking Depositions. Unless otherwise stipulated by all interested parties, pursuant to Federal Rule of Civil Procedure 29, and excepting the circumstances governed by Federal Rule of Civil Procedure 30(a), a party desiring to take the deposition within the State of Florida of any person upon oral examination shall give at least seven (7) days' notice in writing to every other party to the action and to the deponent (if the deposition is not of a party), and a party desiring to take the deposition in another State of any person upon oral examination shall give at least fourteen (14) days' notice in writing to every other party to the action and the deponent (if the deposition is not of a party). Failure to comply with this rule obviates the need for protective order.

In light of such noncompliance, we will not be attending these depositions and will be moving to strike and for sanctions, as appropriate, should you be intent on proceeding despite your obvious noncompliance.

Thanks,  
Ben

---

**From:** Peter M. Hoogerwoerd <pmh@rgpattorneys.com>  
**Sent:** Tuesday, August 10, 2021 9:09 AM  
**To:** Robinson, Blair <Blair.Robinson@bakermckenzie.com>; Davis, Benjamin Cody <Benjamin.Davis@bakermckenzie.com>; Roppolo, William V. <william.roppolo@bakermckenzie.com>; Evans, Paul <Paul.Evans@bakermckenzie.com>  
**Subject:** [EXTERNAL] FW: Harapeti, Silva v CBS Television Stations Inc. et al. / Witness: David Friend

Please see attached subpoena and notice of deposition for David Friend today at 10:00 a.m.

Very truly yours,

---

**PETER M. HOOGERWOERD, ESQ.**  
*Equity Partner*

---

Main: 305-416-5000  
Direct: 786-457-1062  
Fax: 305-675-0665  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
[Attorney Biography](#)

**REMER & GEORGES-PIERRE PLLC**  
ATTORNEYS AT LAW

COURTHOUSE TOWER  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

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**From:** PMH Assistant <[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)>

**Sent:** Tuesday, August 10, 2021 9:08 AM

**To:** Peter M. Hoogerwoerd <[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)>

**Subject:** FW: Harapeti, Silva v CBS Television Stations Inc. et al. / Witness: David Friend

Kindest Regards,

**Niurizette Reyes**  
*Legal Assistant*  
(Not an attorney)

Main: 305-416-5000  
Fax: 305-416-5005  
[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)

**REMER & GEORGES-PIERRE PLLC**  
ATTORNEYS AT LAW

Courthouse Tower  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

State & Federal Court Trial Attorneys

Click here: [Employment Law](#) | [Personal Injury Law](#)

**Confidentiality Notice**

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portion of this e-mail (including any attachments hereto) may be used in connection with the promotion, marketing, or recommendation to any party or person of any transaction or matter addressed herein as my in any way pertain or relate to any United States federal tax advice. The foregoing disclosure is being made in order to comply with the requirements of IRS Circular 230, and is not made to suggest or imply that any tax advice is being rendered herein, insofar as Remer & Georges-Pierre, PLLC does not render tax advice within the normal course of its practice.

---

**From:** PMH Assistant [mailto:[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)]

**Sent:** Tuesday, July 27, 2021 4:21 PM

**To:** 'Due Process, LLC' <[service@dueprocessglobal.com](mailto:service@dueprocessglobal.com)>

**Cc:** Peter M. Hoogerwoerd <[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)>; 'Chabely Lopez' <[clopez@rgpattorneys.com](mailto:clopez@rgpattorneys.com)>; Cristobal Bobadilla-Gamboa <[cbg@rgpattorneys.com](mailto:cbg@rgpattorneys.com)>

**Subject:** Harapeti, Silva v CBS Television Stations Inc. et al. / Witness: David Friend

Hello Juan,

See attached Notice of Deposition and Subpoena for Mr. David Friend. Please serve this at the address below and note the Deposition is scheduled for August 10<sup>th</sup>.

**David Friend**  


Kindest Regards,

---

**Niurizette Reyes**  
*Legal Assistant*  
(Not an attorney)



Main: 305-416-5000  
Fax: 305-416-5005  
[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)

Courthouse Tower  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

State & Federal Court Trial Attorneys

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requirements of IRS Circular 230, and is not made to suggest or imply that any tax advice is being rendered herein, insofar as Remer & Georges-Pierre, PLLC does not render tax advice within the normal course of its practice.

# Exhibit 4

to the Declaration of Blair Robinson, Esq.



**From:** PMH Assistant <pmhassistant@rgpattorneys.com>  
**Sent:** Tuesday, August 10, 2021 12:40 PM  
**To:** Davis, Benjamin Cody  
**Cc:** Peter M. Hoogerwoerd; Cristobal Bobadilla-Gamboa; Robinson, Blair; Evans, Paul; Pantin, John; Roppolo, William V.  
**Subject:** [EXTERNAL] FW: SERVICE OF COURT DOCUMENTS: Case No. 20-cv-20961 Silva Harapeti v. CBS Television Stations Inc. et al.  
**Attachments:** Notice of depo - Peter Dunn.pdf; Peter Dunn Subpoena.pdf; Notice of depo - David Friend.pdf; David Friend Subpoena.pdf

Court:	U.S. District Court for the Southern District of Florida
Case No.:	1:20-cv-22995-KMS
Plaintiff:	Silva Harapeti
Defendants:	CBS Television Stations Inc. et al
Documents Served:	<ol style="list-style-type: none"> <li>1. Subpoena for Deposition (Witness: Peter Dunn)</li> <li>2. Notice of Deposition (Witness: Peter Dunn)</li> <li>3. Subpoena for Deposition (Witness: David Friend)</li> <li>4. Notice of Deposition (Witness: David Friend)</li> </ol>
Sender's Name:	Niurizette Reyes on behalf of Peter M. Hoogerwoerd, Esq., (305) 416-5000

Kindest Regards,

**Niurizette Reyes**

*Legal Assistant  
(Not an attorney)*



Main: 305-416-5000  
Fax: 305-416-5005  
[pmhassistant@rgpattorneys.com](mailto:pmhassistant@rgpattorneys.com)

Courthouse Tower  
44 West Flagler Street, Suite 2200  
Miami, Florida 33130

State & Federal Court Trial Attorneys

Click here: [Employment Law](#) | [Personal Injury Law](#)

#### Confidentiality Notice

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contains any United States federal tax advice, that such advice is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code. Moreover, no portion of this e-mail (including any attachments hereto) may be used in connection with the promotion, marketing, or recommendation to any party or person of any transaction or matter addressed herein as my in any way pertain or relate to any United States federal tax advice. The foregoing disclosure is being made in order to comply with the requirements of IRS Circular 230, and is not made to suggest or imply that any tax advice is being rendered herein, insofar as Remer & Georges-Pierre, PLLC does not render tax advice within the normal course of its practice.

## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

SILVA HARAPETI, and other similarly situated indivi

*Plaintiff*

v.

CBS TELEVISION STATIONS, INC., a Foreign Profit  
Corporation, et al*Defendant*

Civil Action No. 1:20-CV-22995-KMW

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Peter Dunn, [REDACTED]

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Virtual via Zoom, link to be provided. See attached  
Notice of Taking Deposition

Date and Time:

08/24/2021 10:00 am

The deposition will be recorded by this method: Stenographer and Video

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/10/2021

CLERK OF COURT

OR

/s/ Peter M. Hoogerwoerd

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Silva Harapeti, Remer & Georges-Pierre, PLLC 44 W Flagler St, Ste 2200 Miami, FL 33 , who issues or requests this subpoena, are:

Counsel for Plaintiff

## Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:20-CV-22995-KMW

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_ .

☐ I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
 \$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_  
 \_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**CASE NO.: 1:20-cv-22995-KMW**

SILVA HARAPETI,  
and other similarly situated individuals,  
Plaintiff,  
vs.

CBS TELEVISION STATIONS INC.,  
and CBS BROADCASTING, INC.,  
Defendant.

---

**NOTICE OF TAKING DEPOSITION**

TO: William V. Roppolo, Esq.  
william.roppolo@bakermckenzie.com  
Benjamin C. Davis, Esq.  
benjamin.davis@bakermckenzie.com  
BAKER & MCKENZIE LLP  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

Blair J. Robinson (Pro Hac Vice)  
blair.robinson@bakermckenzie.com  
Paul C. Evans (Pro Hac Vice)  
paul.evans@bakermckenzie.com  
BAKER & MCKENZIE LLP  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

PLEASE TAKE NOTICE that at the following location, on **Tuesday, August 24<sup>th</sup>, 2021**  
**at 10:00 a.m.** the undersigned attorney for Plaintiff in the above-styled cause will, for the purpose  
of discovery, by oral examination take the following depositions:

**Time/Deponent:** 10:00A.M. – Peter Dunn

**Location:** Via Zoom Videoconference

<https://proceedings.veritext.com/?token=62bcace342c525f96b73b7dd7a629e29>

The deposition may continue from day to day until completed. The deposition will be taken before an officer authorized to record the testimony. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, before VERITEXT, Notary Public, or before some other officer authorized by law to administer oaths, who is not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, or financially interested in the action, and pursuant to adjournments, if any, by said officer until said testimony shall be completed. You are hereby notified to be present at the time and place stated, if you so desire.

Dated August 10, 2021

Respectfully submitted,

/s/ Peter M. Hoogerwoerd  
Peter M. Hoogerwoerd, Esq  
Fla. Bar No.: 0188239  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
***Remer & Georges-Pierre, PLLC***  
44 West Flagler Street, Suite 2200  
Miami, FL 33130  
(305) 416-5000- Telephone  
(305) 416-5005- Facsimile

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via Electronic

Mail to all parties and/or their counsel on the attached Service List in compliance with Florida

Rule of Judicial Administration 2.516 this 10<sup>th</sup> Day of August of 2021.

William V. Roppolo, Esq.  
william.roppolo@bakermckenzie.com  
Benjamin C. Davis, Esq.  
benjamin.davis@bakermckenzie.com  
BAKER & MCKENZIE LLP  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

Blair J. Robinson (Pro Hac Vice)  
blair.robinson@bakermckenzie.com  
Paul C. Evans (Pro Hac Vice)  
paul.evans@bakermckenzie.com  
BAKER & MCKENZIE LLP  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

/s/ Peter M. Hoogerwoerd  
Peter M. Hoogerwoerd, Esq.  
Fla. Bar No.: 0188239  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
**Remer & Georges-Pierre, PLLC**  
44 West Flagler Street, Suite 2200  
Miami, FL 33130  
(305) 416-5000- Telephone  
(305) 416-5005- Facsimile



## UNITED STATES DISTRICT COURT

for the

Southern District of Florida

SILVA HARAPETI, and other similarly situated indivi

*Plaintiff*

v.

CBS TELEVISION STATIONS, INC., a Foreign Profit  
Corporation, et al*Defendant*

Civil Action No. 1:20-CV-22995-KMW

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: David Friend, [REDACTED] W. 89 Street [REDACTED] New York, NY 10024

(Name of person to whom this subpoena is directed)

☒ **Testimony:** YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must promptly confer in good faith with the party serving this subpoena about the following matters, or those set forth in an attachment, and you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about these matters:

Place: Virtual, via Zoom link to be provided. See attached  
Notice of Taking Deposition

Date and Time:

08/27/2021 10:00 am

The deposition will be recorded by this method: Stenographer and Video

☐ **Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 08/10/2021

CLERK OF COURT

OR

/s/ Peter M. Hoogerwoerd

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) Silva Harapeti, Remer & Georges-Pierre, PLLC 44 W Flagler St Ste 2200 Miami FL 33 , who issues or requests this subpoena, are:

Counsel for Plaintiff

## Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 1:20-CV-22995-KMW

**PROOF OF SERVICE***(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)*

I received this subpoena for *(name of individual and title, if any)* \_\_\_\_\_  
 on *(date)* \_\_\_\_\_ .

☐ I served the subpoena by delivering a copy to the named individual as follows: \_\_\_\_\_

\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

☐ I returned the subpoena unexecuted because: \_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also  
 tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of  
 \$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: \_\_\_\_\_ \_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information regarding attempted service, etc.:

**Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)****(c) Place of Compliance.**

**(1) For a Trial, Hearing, or Deposition.** A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

**(2) For Other Discovery.** A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

**(1) Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

**(2) Command to Produce Materials or Permit Inspection.**

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

**(3) Quashing or Modifying a Subpoena.**

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

**(1) Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

**(2) Claiming Privilege or Protection.**

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

**(g) Contempt.**

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
**CASE NO.: 1:20-cv-22995-KMW**

SILVA HARAPETI,  
and other similarly situated individuals,  
Plaintiff,  
vs.

CBS TELEVISION STATIONS INC.,  
and CBS BROADCASTING, INC.,  
Defendant.

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**NOTICE OF TAKING DEPOSITION**

TO: William V. Roppolo, Esq.  
william.roppolo@bakermckenzie.com  
Benjamin C. Davis, Esq.  
benjamin.davis@bakermckenzie.com  
BAKER & MCKENZIE LLP  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

Blair J. Robinson (Pro Hac Vice)  
blair.robinson@bakermckenzie.com  
Paul C. Evans (Pro Hac Vice)  
paul.evans@bakermckenzie.com  
BAKER & MCKENZIE LLP  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

PLEASE TAKE NOTICE that at the following location, on **Friday, August 27<sup>th</sup>, 2021 at 10:00 a.m.** the undersigned attorney for Plaintiff in the above-styled cause will, for the purpose of discovery, by oral examination take the following depositions:

**Time/Deponent:** 10:00A.M. – David Friend

**Location:** Via Zoom Videoconference

<https://proceedings.veritext.com/?token=a36d72fcfc982de02398dbd44cf7a907>

The deposition may continue from day to day until completed. The deposition will be taken before an officer authorized to record the testimony. The deposition is being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the Federal Rules of Civil Procedure, before VERITEXT, Notary Public, or before some other officer authorized by law to administer oaths, who is not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, or financially interested in the action, and pursuant to adjournments, if any, by said officer until said testimony shall be completed. You are hereby notified to be present at the time and place stated, if you so desire.

Dated August 10, 2021

Respectfully submitted,

/s/ Peter M. Hoogerwoerd  
Peter M. Hoogerwoerd, Esq  
Fla. Bar No.: 0188239  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
***Remer & Georges-Pierre, PLLC***  
44 West Flagler Street, Suite 2200  
Miami, FL 33130  
(305) 416-5000- Telephone  
(305) 416-5005- Facsimile

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a true and correct copy of the foregoing was furnished via Electronic

Mail to all parties and/or their counsel on the attached Service List in compliance with Florida

Rule of Judicial Administration 2.516 this 10<sup>th</sup> Day of August of 2021.

William V. Roppolo, Esq.  
william.roppolo@bakermckenzie.com  
Benjamin C. Davis, Esq.  
benjamin.davis@bakermckenzie.com

**BAKER & MCKENZIE LLP**  
Sabadell Financial Center  
1111 Brickell Avenue, Suite 1700  
Miami, Florida 33131  
Telephone: (305) 789-8900  
Facsimile: (305) 789-8953

Blair J. Robinson (Pro Hac Vice)  
blair.robinson@bakermckenzie.com  
Paul C. Evans (Pro Hac Vice)  
paul.evans@bakermckenzie.com

**BAKER & MCKENZIE LLP**  
452 Fifth Avenue  
New York, NY 10018  
Telephone: (212) 626-4100  
Facsimile: (212) 310-1632

*Attorneys for CBS Television Stations, Inc.*

/s/ Peter M. Hoogerwoerd  
Peter M. Hoogerwoerd, Esq.  
Fla. Bar No.: 0188239  
[pmh@rgpattorneys.com](mailto:pmh@rgpattorneys.com)  
**Remer & Georges-Pierre, PLLC**  
44 West Flagler Street, Suite 2200  
Miami, FL 33130  
(305) 416-5000- Telephone  
(305) 416-5005- Facsimile